

Marie Fay

From: Wexford Receptionist
Sent: 25 November 2013 16:26
To: Licensing Staff
Subject: FW: E.P.A. I.P.P.C. license Reg. No: P0974-01
Attachments: P0974-01.pdf; ATT00001.txt; ATT00002.htm

From: Manager Dau [<mailto:Manager.Dau@ahg.gov.ie>]
Sent: 25 November 2013 16:24
To: Wexford Receptionist
Cc: Grainne Oglesby
Subject: E.P.A. I.P.P.C. license Reg. No: P0974-01

A Chara

I refer to the EPA notification in relation to the above IPPC License application and associated EIS. Attached are the nature conservation recommendations of the Department of the Arts, Heritage and the Gaeltacht.



*An Roinn
Ealaíon, Oldhreacht agus Gaeltachta*
**Department of
Arts, Heritage and the Gaeltacht**

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**An Roinn
Ealaíon, Oidhreachta agus Gaeltachta**
**Department of
Arts, Heritage and the Gaeltacht**

E.P.A. I.P.P.C. license Reg. No: P0974-01

25 November 2013

Programme Officer,
Office of Climate, Licencing & Resource Use,
E.P.A.,
Regional Inspectorate,
Inniscarra,
Co.Cork.

FAO: Grainne Oglesby

Re: Notification to the Minister for Arts, Heritage and the Gaeltacht under Article 28 of the Planning and Development Regulations, 2001

Development: *E.P.A. I.P.P.C. license Reg. No: P0974-01 by Bulrush Horticulture Ltd for extraction of peat in the course of business which involves an area exceeding 50 hectares at Camagh Bog, Doon, Castlepollard, County Westmeath.*

A Chara

I refer to the EPA notification in relation to the above IPPC License application and associated EIS. Outlined below are the nature conservation recommendations of the Department of the Arts, Heritage and the Gaeltacht.

Nature Conservation

It is noted that the location of the proposed activity is situated in a location likely to impact on Lough Derravaragh Special Protection Area for Birds (SPA) (site code: 004047) and Natural Heritage Area (NHA, site code 000684). Please see www.npws.ie for synopsis of the site.

This Department is of the view that this development :

- Has a potential to damage the habitat of otter, white clawed crayfish and lamprey which are listed under Annex II of the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora).
- Has a potential to damage an area of the habitat of a population of kingfisher and which is listed under Annex 1 of the EU Birds Directive (Council Directive 79/409/EEC).
- Has a potential to damage a significant area of the habitat of coot, tufted duck, pochard and other water birds which are the qualifying interests of the Lough Derravaragh SPA as designated under the EU Birds Directive (Council Directive 79/409/EEC).

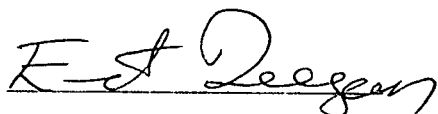
This Department asks the EPA to address the following:

- Article 6 of EU Habitats Directive (Council Directive 92/43/EEC) should be adhered to. In particular, the Department of the Arts, Heritage and the Gaeltacht are concerned that the cumulative impacts and how these may impact on nearby Natura 2000 sites.
- A Rehabilitation / Closure Plan should be completed prior to granting the IPPC licence. The Department of the Arts, Heritage and the Gaeltacht should be consulted as part of the process of drawing up such a plan.
- The EPA should be satisfied that the water monitoring regimes as proposed are adequate.
- Results of water analysis of bog water discharged from the site show elevated levels of ammonia. Further treatment or polishing filters should be explored to address this issue.
- Further improvements are required in regard to the siltation ponds. Existing Silt Pond 1 requires a weir and currently surface water runoff from close to the roadside is discharging directly into the northern drain without any treatment. All surface water runoff at this location needs to be fed into a properly constructed silt pond. Existing Silt Pond 2 discharges through adjacent Coillte property before reaching the Monkstown stream. While Silt Pond 2 appears to be working adequately, there is obvious siltation present in the drain passing through Coillte land. This may be caused by the rate of flow/ volume of water coming from the Bulrush site which then causes bankside erosion as it passes through the Coillte afforested bog site. Mitigation measures should be put in place to reduce the impact on the Monkstown Stream. EPA should be satisfied that the design specifications proposed for all silt traps will be adequate to cope with all high rainfall events.
- EIS recommendations in regard to dust monitoring and reduction measures are inadequate. The EIS suggests that the adjacent Coillte woodland will act as a buffer between the site and the River Inny to the west. However, this forest is currently partly felled and the remainder will be felled in the future therefore there will be periods when this forest will not act as a buffer. As such, a more permanent buffer should be established around the perimeter of the site to prevent impact on nearby terrestrial and wetland habitats.

The acknowledgement to this letter, any further information and/or the planning authority's decision should ideally be sent to **manager.dau@ahg.gov.ie**; if this is not possible, correspondence may **alternatively** be sent to:

The Manager
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Department of Arts, Heritage and the Gaeltacht
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Is mise le meas,



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